

# Milbank

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June 26, 2020

**VIA ECF**

Hon. Lewis J. Liman  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Financial Guaranty Insurance Company v. The Putnam Advisory Company, LLC*,  
No. 12-cv-7372 (S.D.N.Y.)

Dear Judge Liman:

This firm represents Defendant The Putnam Advisory Company, LLC (“Putnam”) in the above-referenced matter. Pursuant to the Court’s June 23, 2020 Order (ECF No. 323), Putnam hereby proposes to present its Phase 1 witnesses in the following order:

1. Carl D. Bell
2. John C. Van Tassel
3. Dr. Francis Longstaff, PhD, CPA, CFA
4. John H. Dolan

Dr. Longstaff is currently scheduled to testify as an expert witness in another trial on or between July 21-23, 2020. Accordingly, depending on when Putnam begins its case-in-chief, Putnam may need to call Dr. Longstaff out of order, should the Court allow Putnam to do so.

Respectfully submitted,

/s/ Thomas A. Arena  
Thomas A. Arena

cc: All Counsel of Record (via ECF)

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